

NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control (DTSC)
Cleanup Program - Cypress
5796 Corporate Avenue
Cypress, CA 90630

Project Title: Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Remedial Action Plan/Interim Action (RAP/IA) at Installation Restoration Program (IRP) Site 29 (Site 29, Air Force Plant 42 [AFP 42]), Palmdale California

Project Location: Air Force Plant 42, near Palmdale, California

County: Unincorporated, Los Angeles County

Project Description:

Site 29, Groundwater at Plant Site 1. Site 29 consists of the trichloroethylene (TCE)-impacted vadose zone and groundwater at Plant Site 1. The plant site is located in the northwestern portion of AFP 42. Construction at the plant site began in 1953 with construction of the two main aircraft hangars, Buildings 145 and 150, occurring in 1953 and 1955, respectively. Based on the results of soil gas and soil investigations, releases of TCE appear to have occurred in the northwest portion of Building 150. This area corresponds to the location of the former north end of the hangar, before the addition of the high bay in the early 1970s. TCE has been detected at monitoring wells at Site 29 at concentrations up to 302 micrograms per liter ($\mu\text{g/L}$). Groundwater contamination occurs at approximately 365 feet below ground surface and TCE is the only chemical of concern (COC) identified in soil and groundwater at Plant Site 1.

The proposed interim action at Site 29 includes operation of the existing SVE pilot study system and installation of a groundwater extraction, treatment, and injection system. The SVE system was constructed on a paved industrial area of the base and consists of four SVE wells (two deep wells and two wells angled beneath Building 150) and a vapor-phase activated carbon (VGAC) treatment system. The system is designed to operate at a maximum flow rate of 400 standard cubic feet per minute (scfm). Based on the most recent pilot study data, the TCE influent concentration will be approximately 8 part per million volume (ppmv). The vapors will pass through two 1,000 pound VGAC vessels in series. The removal efficiency of the carbon is 100 percent prior to breakthrough. A removal efficiency of 98 percent was assumed for the emission calculations documented in the "Notification of Construction and Operation" provided to Antelope Valley Air Quality Management District (AVAQMD) in March 2006. The notification included an evaluation of compliance with AVAQMD emissions rules. AVAQMD provided a concurrence letter on March 26, 2006. It is expected that the 1,000 pound VGAC vessels will be changed out approximately four times a year. The spent carbon is expected to be classified as nonhazardous and will be taken to an appropriate offsite facility for regeneration following waste profiling.

The groundwater treatment system and three groundwater extraction wells will be constructed on a paved industrial area of AFP 42 and the injection well will be located in an unpaved area within the operational area of the facility. The groundwater treatment system is expected to operate at 110 gallons per minute (GPM); the influent TCE concentration is expected to be 75 $\mu\text{g/L}$. Extracted groundwater will be treated with liquid-phase activated carbon (LGAC) prior to reinjection. Groundwater will be treated in two 5,000 pound LGAC vessels in series; effluent TCE concentrations are expected to be less than reporting limits ($<0.5 \mu\text{g/L}$). It is expected that one 5,000 pound LGAC vessel will be replaced per year. The spent carbon is expected to be classified non-RCRA hazardous waste; however the waste will be sampled prior to disposal to establish an appropriate waste profile. The spent LGAC and will be taken to an appropriate offsite facility for recycling.

Interim cleanup goals have been established as 5 $\mu\text{g/L}$ for TCE in groundwater (Federal and State maximum contaminant level for TCE) and 3.9 ppmv for TCE in soil gas (maximum calculated concentration at which TCE in soil gas will not cause groundwater concentrations to exceed 5 $\mu\text{g/L}$ TCE).

During trenching and construction, standard engineering/construction practices, such as water spray, will be used to control potential dust emissions. Personal air monitoring for worker safety and continuous dust generation monitoring will be conducted by field staff to ensure compliance with Antelope Valley Air Quality Management District regulations. The excavated soils will be stockpiled onsite in designated areas pending the results of the waste characterization

laboratory analyses. The stockpile area will be located within approximately 100 feet from the trench. Soil stockpiles will be placed on top of clean plastic sheeting and covered and bermed at times of inactivity.

Following waste characterization, excavated soils will be loaded into truck/trailer units for transport to a designated offsite disposal facility. It is expected that the soils will not be hazardous based on remedial investigation which showed mostly groundwater contamination which occurs at approximately 365 feet below ground surface. Soils will be transported by a registered waste hauler. All equipment will be decontaminated prior to leaving the area. Site specific work, health and safety, and emergency response plans will be prepared, and approved, prior to the initiation of field work.

The time necessary to install the groundwater containment system is approximately 14 weeks. The project is expected to commence on January 6, 2009.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project:

U.S. Air Force, Restoration Division, Aeronautical System Center,
Engineering Directorate (ASC/ENV), WPAFB, Ohio
Contact: George Warner

Exemption Status: (check one)

- ☐ Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- ☐ Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec. 15269(a)]
- ☐ Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec. 15269(b)(c)]
- ☐ Categorical Exemption: [State type and section number]
- ☐ Statutory Exemptions: [State code section number]
- ☒ General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: With certainty, No possibility of a significant effect on the environment.

Reasons Why Project is Exempt:

1. The site is located within the boundaries of AFP 42, an active military installation. Land use at AFP 42 is limited to industrial operations and encompassed by barbed-wire fencing. Site access is through designated gates that are manned by security personnel 24 hours per day. In addition, each plant site is also secured by barbed-wire fencing and 24-hour security at the plant site-specific access gates. There is no access available to the area by the general public, and access by non-essential personnel will be restricted during soil removal activities.
2. The nearest potential residential receptors are more than a mile away. The volume of waste generated as part of the system installation is expected to be small (approximately 100 tons, or 5 truck loads, of soil and concrete). The soils to be removed are not of a reactive or explosive nature. Excavated materials will be handled by licensed and registered transporters, in compliance with all applicable State and federal laws and regulations. Truck staging will occur along the existing paved roads within AFP 42. All wastes are expected to be non-hazardous and will be transported to a Class III landfill in California (Palmdale Landfill). The transportation route to the disposal site consists of well maintained, all purpose, state highways and county roads. Site 29 is located approximately 4 miles from the nearest freeway (State Route 14), and the planned arrival and departure of trucks will be scheduled between 8:00 am and 4:00 pm to avoid peak traffic period. The City of Palmdale has concurred with the peak traffic hours for the truck route. Also, according to the City of Palmdale Planning Department, no schools are located along the planned truck transportation route to the nearest highway (i.e., along Avenue M between the project site and Highway 14).
3. Control measures will be used to keep dust to below the visible level. If dust cannot be controlled to this level due to high winds, work will be stopped. The project will comply with Antelope Valley Air Quality Management District (AVAQMD) Rule 403 relating to fugitive dust at the property line. For workers protection, miniram meters will be used for direct dust reading.
4. The majority of the project area consists of a paved, active industrial facility. However, one injection well will be located in an unpaved area within the operational area of the facility. This area consists of non-native grassland and Joshua tree woodland. The disturbance caused by site activities discourages animal habitation in the area. No endangered, threatened, or rare plant or animal species were observed at AFP 42 during biological surveys;

therefore, none are expected to be present at the site. To confirm that no special status species are present, a preconstruction survey will be conducted by a qualified biologist at the planned well location and within a 500-foot buffer prior to trenching.

5. A cultural study performed for AFP 42 indicated that Site 29 does not contain paleontological resources. Cultural resources at Site 29 are limited to Building 150, which is eligible for listed on the National Register of Historic Places due to its role in the United States Space Shuttle Program. However, the Site 29 treatment system will not involve any modifications to or construction in Building 150. In addition, the Native American Heritage Commission performed a record search of its Sacred Lands File (SLF) for the affected area. The SLF failed to indicate the presence of Native American cultural resources at Air Force Plant 42. Also, DTSC sent solicitation letters to Native American contacts to find out if they have information on cultural resources at Air Force Plant 42 and did not receive interest from the Native American contacts. Cultural Resources are summarized in the October 2005 Integrated Cultural Resources Management Plan for AFP 42. Five federally recognized American Indian tribes are affiliated with the AFP 42 area; there are no known traditional cultural properties or sacred sites within the boundary of AFP 42. During previous contact with each of the tribes, no interest in the AFP 42 area has been expressed.
6. DTSC may require institutional controls to restrict Site 29 to industrial reuses if residential cleanup goals cannot be achieved. If institutional controls are required, the Air Force will submit an implementation plan for DTSC approval that include land use controls equivalent to a land use covenant.

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Date Received For Filing and Posting at OPR: